



513069

OCT 1 9 2001

SC-6J

Scott Fawcett
Manager, Utilities
LTV Steel Co., Hennepin Works
P.O. Box 6778
Cleveland, OH 44101

Re: Request for Information Pursuant to Section 114(a) of the Clean Air Act, LTV Steel Co.,
Hennepin Works, Hennepin, IL

Dear Mr. Fawcett:

On June 16, 1999, LTV Steel Co., Hennepin Works submitted a Risk Management Plan (RMP) to U.S. EPA. The facility submitted the RMP pursuant to Section 112(r) of the Clean Air Act, 42 U.S.C. §7412(r) and 40 C.F.R. Part 68 for listed chemicals in excess of threshold quantities in a process located at the above facility. U.S. EPA assigned the facility RMP ID # 1000 0008 2171.

Section 112(r) of the Clean Air Act and 40 C.F.R. §68.190 require that an owner or operator review and update the RMP within five years from the original submission or most recent update, whichever is later. Further, 40 C.F.R. Part 68.190(c) requires that an owner or operator deregister within 6 months from the date a facility is no longer subject to RMP regulations. Our records indicate that your facility has submitted neither an update nor a deregistration.

If your company is no longer subject to the RMP regulations at this location you need to take one of the three following actions. To assist you in determining whether your facility is subject to the RMP regulations enclosed is a list of the RMP regulated chemicals along with their threshold quantities.

- 1) If the subject facility is closed, complete the enclosed "*Declaration of Closure*" and deregister as described below. Please note that this option only applies if the facility is no longer in operation and all substances subject to RMP regulations have been removed.
- 2) If the subject facility has reduced its maximum inventory of all chemicals subject to RMP regulation below the threshold quantity, complete the enclosed "*Declaration of Inventory*" and deregister as described below.
- 3) If the subject facility has been sold, complete the enclosed "*Declaration of Change of Ownership*."

Your response to must be submitted within fourteen (14) calendar days from your receipt of this letter.

To deregister your facility, you should submit a letter to the RMP reporting center and include the date of deregistration (the date on which your facility was no longer covered by the RMP regulations). The letter should be signed by the owner or operator and include your RMP ID number. Enclosed for your convenience is a "*Risk Management Plan De-Registration Form*." This form meets the requirements for deregistering and can be submitted to the RMP Reporting Center at the address on the form. Further, the enclosed RMP Submit 2004 software can generate a letter of deregistration.

If your company is the current owner or operator of the subject facility and it has onsite chemicals subject to RMP regulations in greater than threshold quantities, you need to answer the questions articulated in APPENDIX A. Your response to Appendix A must be submitted within fourteen (14) calendar days of receipt of this request. All information submitted in response to this request must be certified as true, correct, accurate, and complete, by an individual with sufficient knowledge and authority to make such representation on behalf of LTV Steel Co., Hennepin Works.

You may assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. § 2.203(b). Failure to assert a claim of business confidentiality renders all submitted information available to the public without further notice. Information which is not subject to a claim of business confidentiality may be available to the public without further notice. Information which is subject to a claim of business confidentiality may be available to the public only to the extent provided in 40 C.F.R. Part 2, Subpart B.

Your response to this information request or signed "Declaration" must be mailed to:

Silvia Palomo
U.S. EPA, Region 5
Office of Chemical Emergency Preparedness and Prevention
United States Environmental Protection Agency
77 W. Jackson Boulevard (SC-6J)
Chicago, Illinois 60604

Please direct any questions you may have regarding this information request to Silvia Palomo at palomo.silvia@epa.gov or (312) 353-2172.

Please note that EPA has the authority under Section 114(a) of the Clean Air Act, 42 U.S.C. § 7414(a), to gather the information being sought and use the information that you provide in a subsequent administrative, civil, or criminal action. Failure to fully comply with the terms of this request for information, or to adequately justify a failure to respond, can result in enforcement action by the EPA pursuant to Section 113 of the Clean Air Act, 42 U.S.C. § 7413. This information request is not subject to the approval requirements of the Paperwork Reduction Act of 1989, 44 U.S.C. § 3501 et seq., because it pertains to the investigation of a specific entity.

If upon review of your response to this information request you determine that your facility is still subject to the RMP regulations and should have submitted an update RMP, you are strongly encouraged to do so as soon as possible. A copy of the "*RMP Submit 2004*" CD is enclosed to facilitate your filing.

The U.S. EPA strongly encourages you to give this matter your immediate attention and to respond to this letter within the time specified above.

Thank you for your cooperation in this matter.

Sincerely yours,

Richard C. Karl, Director
Superfund Division

Enclosures (5)

You may assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. § 2.203(b). Failure to assert a claim of business confidentiality renders all submitted information available to the public without further notice. Information which is not subject to a claim of business confidentiality may be available to the public without further notice. Information which is subject to a claim of business confidentiality may be available to the public only to the extent provided in 40 C.F.R. Part 2, Subpart B.

Failure to fully comply with the terms of this request for information, or to adequately justify a failure to respond, can result in enforcement action by the U.S. EPA pursuant to Section 113 of the Act, 42 U.S.C. § 7413.

The U.S. EPA has the authority to use the information requested herein in an administrative, civil, or criminal action. This information request is not subject to the approval requirements of the Paperwork Reduction Act of 1989, 44 U.S.C. § 3501 et seq., because it seeks collection of information in an enforcement action or investigation involving the U.S. EPA and specific individuals or entities.

Your response to this information request and other forms, as required by Appendix A, should be mailed to:

Silvia Palomo
U.S. EPA, Region 5
Office of Chemical Emergency
Preparedness and Prevention
United States Environmental Protection Agency
77 W. Jackson Boulevard (SC-6J)
Chicago, Illinois 60604

Please direct any questions you may have regarding this information request to Silvia Palomo at palomo.silvia@epa.gov or (312) 353-2172.

Due to the potential seriousness of the problem at the facility and the legal ramifications of your failure to respond promptly, the U.S. EPA strongly encourages you to give this matter your immediate attention and to respond to this information request within the time specified above.

Thank you for your cooperation in this matter.

Sincerely yours,

Richard C. Karl, Director
Superfund Division

Enclosures

CONCURRENCE REQUESTED						
OFFICE OF CHEMICAL EMERGENCY PREPAREDNESS, OSF						
AC 9/23						
AUTH	TYPIST	ORD	CHIEF	ADD	WMD	ORA

DISK INFORMATION:

Appendix A

The following information must be supplied for the following facility in accordance with the foregoing Request of Information pursuant to the Clean Air Act:

LTV Steel Co., Hennepin Works

Rts. 180 & 71

Hennepin, IL

RMP ID#: 1000 0008 2171

- 1) Submit your current RMP ID (if different from above).
- 2) Submit the number of employees at this location.
 - a) Of these how many are Full time? Part time? Seasonal?
- 3) What listed chemicals are located at this facility? (see enclosed list of Regulated Chemicals)
- 4) For each substance listed in above, what is the maximum amount of each chemical used or stored at the facility in the past twelve months? What are normal operating levels? How were these totals calculated?
- 5) Since you submitted its RMP on June 16, 1999 has the facility changed the maximum amount of listed substance(s) used or stored onsite? Describe these changes.
- 6) Does the facility have a Title V Air Pollution Permit? What is the permit number?
- 7) Who is the current emergency contact? What is this contact's phone number?
- 8) On what date did the process subject to RMP regulations begin operation?
- 9) When was the most recent Hazard Review or Process Hazard Assessment (PHA) done at the facility? Submit a copy of the most recent Hazard Review or PHA.
- 10) Does the facility have standard operating procedures for RMP processes? When were they last updated? Submit a copy of the most recent certification.
- 11) Submit the two most recent compliance audits performed on the Risk Management Program for the facility.
- 12) When was your emergency response policy last modified? What is your facility's policy toward revising the emergency response policy?
- 13) Have there been any changes to the process, chemicals, technology, equipment or procedures in the processes subject to RMP regulations in the last five years? If so, submit a copy of the Management of Change documentation.



Declaration of Closure

LTV Steel Co., Hennepin Works
Hennepin, IL

INSTRUCTIONS: Facilities that, at one time, had a Risk Management Program and submitted a Risk Management Plan to U.S. EPA and are no longer in business and have removed, or caused the removal of, all RMP regulated substances from this location may use this document. A list of RMP regulated substances is enclosed and can also be found at 40 C.F.R. Part 68.130. A responsible official representing the owner or operator of your facility should certify that the facility is closed and clean. However, be aware that in the event false information is provided, the responsible official and your company will be subject to criminal and civil sanctions pursuant to Section 113(c)(2) of the Clean Air Act and Title 18 Section 1001 of the United States Code. The information listed below was the facility location as reported to U.S. EPA, please make any corrections to ensure accuracy.

Certification

I certify under penalty of law that the facility listed below is no longer in operation and all substances listed in 40 C.F.R. Part 68.130 have been removed from this location. I am familiar with this facility and the activities that took place during its closure. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

LTV Steel Co., Hennepin Works
RMP ID# 1000 0008 2171
Rts. 180 & 71
Hennepin, IL 61327

Signature

Date

Title of Position Held
(e.g., President, Owner)

Current Contact Information

Mailing Address

Telephone Number(s)



Declaration of Change of Ownership

LTV Steel Co., Hennepin Works
Hennepin, IL

Listed RMP Contact and Operator of Record:
Scott Fawcett, Manager, Utilities
LTV Steel Company, Inc.
P.O. Box 6778
Cleveland, OH 44101

INSTRUCTIONS: According to information submitted to U.S. EPA, the Operator of Record listed above currently holds the responsibility for maintaining the facility's Risk Management Program. If you no longer own or operate this facility and have transferred those responsibilities to another entity complete this document. It's the current owner's responsibility to submit a corrected RMP. A responsible official representing the Operator of Record should certify on this document. However, be aware that in the event false information is provided, the responsible official and the company may be subject to criminal and civil sanctions pursuant to Section 113(c)(2) of the Clean Air Act and Title 18 Section 1001 of the United States Code. The information listed at the top of this page is the facility location as reported to U.S. EPA, please make any corrections to ensure accuracy. You must supply information regarding to whom the facility was sold.

Certification

I certify under penalty of law that I am no longer the owner or operator of the facility listed below. I was familiar with this facility and the activities that took place prior to and during the transfer of ownership or have undertaken to discover these activities. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

LTV Steel Co., Hennepin Works
RMP ID# 1000 0008 2171
Rts. 180 & 71
Hennepin, IL 61327

Signature

Date

Title of Position
(e.g., President, Owner)

The facility was sold to the following entity

Name and Mailing Address

Date of Sale

If the new owner has applied for and
received a new RMP ID # check here.

☐

Provide new RMP ID # if known



Declaration of Inventory

LTV Steel Co., Hennepin Works
Hennepin, IL

INSTRUCTIONS: According to information submitted to U.S. EPA, the entity listed below currently has an RMP regulated chemical in excess of threshold quantities. If the facility has taken action to permanently reduce the maximum potential inventory of all RMP regulated chemicals below the thresholds defined in 40 C.F.R. Part 68.130 (see enclosed list), then your facility is no longer subject to RMP requirements. If your facility is no longer subject to RMP requirements, it is your responsibility to submit a de-registration for your facility within six month of the change. A form that can be used to de-register your facility is enclosed. A responsible official representing the owner or operator of this facility should certify on this document. The responsible official is defined as the person who make the principal business decisions for the facility. However, be aware that in the event false information is provided, the responsible official and your company may be subject to criminal and civil sanctions pursuant to Section 113(c)(2) of the Clean Air Act and Title 18 Section 1001 of the United States Code. The information listed below was the facility location as reported to U.S. EPA, please make any corrections to ensure accuracy.

Certification

I certify under penalty of law that the facility listed below is no longer maintains a potential inventory above the threshold quantities defined at 40 C.F.R. Part 68.130. I am familiar with the operation of the facility and know the activities undertaken at the facility. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

LTV Steel Co., Hennepin Works
RMP ID# 1000 0008 2171
Rts. 180 & 71
Hennepin, IL 61327

Signature

Date

Title of Position Held
(e.g., President, Owner)

List all RMP chemicals used and/or stored on site and the maximum potential quantity of each. (See enclosure of subject chemicals)

Describe the changes made to the facility to reduce inventory.